

Mark J. Petrocchi  
State Bar No. 15851750  
GRIFFITH, JAY & MICHEL, LLP  
2200 Forest Park Blvd.  
Fort Worth, TX 76110  
Phone (817) 926-2500  
Fax (817) 926-2505  
mpetrocchi@lawgjm.com  
COUNSEL FOR THE DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

|                                     |   |                                |
|-------------------------------------|---|--------------------------------|
| IN RE:                              | § |                                |
| COWTOWN BUS CHARTERS, INC.          | § | CASE NO. 24-43242-mxm-11       |
| DEBTOR,                             | § |                                |
| COWTOWN TRANSPORTATION COMPANY, LLC | § | CASE NO. 25-40860-11           |
| DEBTOR.                             | § | JOINT ADMINISTRATION REQUESTED |

**MOTION FOR JOINT ADMINISTRATION OF CASES**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Cowtown Bus Charters, Inc. and Cowtown Transportation Company, LLC and file this Motion for Joint Administration of Cases.

1. Cowtown Bus Charters, Inc. filed for bankruptcy on September 6, 2024, and was assigned Case No. 24-43242-mxm-11. That Debtor sought and received permission to sell the majority of its personal property assets. That sale has occurred. That Debtor also sought authority to sell the real property held in the name of Cowtown Transportation Company, LLC. That sale has not been completed.

2. Cowtown Transportation Company, LLC is an entity separately recognized by the state of Texas. William Pippen, deceased, acting as a principal caused both Debtors to enter transactions with the Small Business Administration and with First Savings Bank. Those transactions recognize a distinction between the two entities.

3. After the death of William Pippin, the principal now operating the bus company became aware of the claimed existence of Cowtown Transportation Company, LLC. That Debtor does not appear to have requested or received an employer identification number, and does not appear to have ever filed a tax return. The accountant for Cowtown Bus Charters, Inc. indicated that the transactions involving the real property have been included on the tax returns of Cowtown Bus Charters, Inc.

4. Cowtown Bus Charters, Inc. transferred the ownership interest in real property to Cowtown Transportation Company, LLC in December 2016. Transactions were done with lenders in 2017. The remaining principal of Cowtown Bus Charters, Inc. was unaware that she was listed with the Texas Comptroller as a manager and director of the LLC. During the bankruptcy of Cowtown Bus Charters, Inc., Cowtown Transportation Company, LLC has been treated as a subsidiary.

5. Pursuant to Bankruptcy Rule 1015(b), the Court may order joint administration.

6. Because the entities were treated in the manner described above, the Debtors direct the Court's consideration of the potential conflicts of interest believed to be low and similar to any parent and subsidiary in a bankruptcy proceeding where both are obligated to pay secured creditors.

WHEREFORE PREMISES CONSIDERED, the Debtors referenced above pray that the Court jointly administer the above referenced cases; and for such other relief as is just and equitable.

Respectfully submitted,

By: /s/Mark J. Petrocchi  
Mark J. Petrocchi  
State Bar No. 15851750  
GRIFFITH, JAY & MICHEL, LLP  
2200 Forest Park Blvd.  
Fort Worth, TX 76110  
Phone (817) 926-2500  
Fax (817) 926-2505  
[mpetrocchi@lawgjm.com](mailto:mpetrocchi@lawgjm.com)  
ATTORNEY FOR THE DEBTOR

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he caused a true and correct copy of the above and foregoing document to be served upon those parties registered on the ECF filing system of the court this 12<sup>th</sup> day of March 2025.

/s/Mark J. Petrocchi  
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